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<u>REMARKS</u>

Claims 1-30 are pending in the application. Claims 31-50 have been added. In the Office Action mailed July 3, 2002 (hereinafter "Office Action"), Claims 1-30 were rejected under 35 U.S.C. § 103(a) as unpatentable over U.S. Patent No. 6,271,752, issued to Vaios (herein "Vaios") in view of U.S. Patent No. 6,166,729, issued to Acosta et al. (herein "Acosta et al.").

Applicants submit that Claims 1-50 are in condition for allowance because the cited and applied references, alone or in combination, fail teach or suggest a system including a centralized control site including at least one server and an image database having specific functionality related to video surveillance and video monitoring. More specifically, applicants submit that the cited references fail to teach or suggest a server that initializes communications between the surveillance cameras and the off-site client workstations. Additionally, the cited references fail to teach or support a server that coordinates the retrieval of video images from a number of surveillance cameras and produces live video images to off-site client workstations. Additionally, applicants submit that the cited references fail to teach or suggest a server that archives retrieved video images in the image database for subsequent production to at least one client workstation. Prior to providing a more detailed discussion as to the patentability of the claims of the present invention, a brief discussion of the present and the cited art will be presented.

A. Summary of the Present Invention

The present invention is generally directed toward a video surveillance and monitoring system including three identifiable communication layers, namely, a number of surveillance cameras, a centralized control site, and at least one off-site client workstation. The system includes a private network operable to enable two-way communication with one or more surveillance cameras located on-site at a plurality of geographically distinct client sites. The

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centralized control site includes at least one server coupled to the private network and also to a public network. The server coordinates the retrieval of video images from the surveillance cameras. The server also initializes communications between the surveillance cameras and at least one off-site workstation coupled to a public network. The retrieved video images are transmitted to off-site client workstations. The centralized control site also includes an image database in communication with the server. The server further enables the archiving of video images retrieved from the surveillance cameras for subsequent production to a client workstation.

Numerous advantages maybe realized in accordance with one or more embodiments of the present invention. In one aspect, the present invention mitigates the need for each off-site client workstation to have autonomous capability for communicating with each individual surveillance camera by centralizing both storage and image archiving at the centralized control site. In another aspect, the off-site client workstations may communicate with the centralized control site via a public network, while the security cameras maintain data communications via a private network. The centralized control site can maintain initialization control of communications between the workstations and the surveillance cameras. This configuration can mitigate unauthorized direct access of the surveillance cameras by the client workstations. In still a further aspect, the centralized control site allows multiple off-site client workstations to view images retrieved and archived by the centralized control site. Additional advantages may also be realized in accordance with the present invention.

В. Summary of U.S. Patent No. 6,271,752 (Vaios)

Vaios is purportedly directed toward a multi-access remote system for providing access to video data from a security surveillance area. In accordance with the teachings of Vaios, a number of computing devices end-user locations (8) utilize a communications network (6) to

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access data directly from a security surveillance area (4). Each end-user location can access data from the security surveillance area and provide control instructions via the public communications network.

Vaios fails to teach or suggest a centralized control site including a server and an image database in communication with a number of client workstations via a public network and a plurality of geographically distinct surveillance cameras via a private network. Accordingly, Vaios fails to teach or suggest the server initializing communications between a client workstation and a surveillance camera. Vaios also fails to teach or suggest the server coordinating the retrieval of video images from the surveillance cameras and producing live video images to the client workstations. Vaios further fails to teach or suggest the server archiving video images in the image database and making the archived images available for subsequent retrieval by the client workstations.

C. U.S. Patent No. 6,166,729 (Acosta et al.)

Acosta et al. is purportedly directed toward a remote viewing system for displaying images from remote digital image transmission devices. In accordance with the teachings of Acosta et al., the system includes a plurality of remote digital image transmission devices (12) in communication via a wireless network (14) with a central office video management system (16). The central office video management system is in communication, via a Web server (18) connected to the Internet (20), with a computer (22) that views images from the transmission devices.

Acosta et al. fails to teach or suggest a centralized control site that includes a server for initializing communications between client workstations and surveillance cameras. Acosta et al. also fails to teach or suggest a video image database for archiving video images for subsequent transmission to a client workstation.

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II. The Claims Distinguished

A. Rejection of Claims 1-30

1. Claim 1

Claim 1 was rejected under 35 U.S.C. § 103(a) as unpatentable over Vaios in view of Acosta et al. The Office Action asserts that Vaios discloses a video surveillance and monitoring system including a private network that enables communication with surveillance cameras at a plurality of geographic sites. The Office Action concedes that Vaios does not teach the use of an off-site storage site that includes an image database and at least one server operative to coordinate the retrieval of video images from the surveillance cameras. However, the Office Action states that Acosta et al. discloses an off-site storage site including an image database and at least one server operative to coordinate the retrieval of video images from the surveillance cameras, to produce the video images as live images, and to archive the video images in the database. Therefore, the Office Action asserts that it would have been obvious to one of ordinary skill in the art to incorporate the teachings of Vaios with the teachings of Acosta et al. to teach the invention of Claim 1. For the following reasons, applicants respectfully disagree.

As amended, Claim 1 recites:

A video surveillance and monitoring system, comprising:

a private network that enables communication with surveillance cameras corresponding to geographic sites, wherein at least two surveillance cameras correspond to geographically distinct sites; and

a centralized off-site control site, including an image database and at least one server, said at least one server being coupled to said private network and to a public network, said at least one server being operative to initialize communications between the surveillance cameras and at least one off-site client workstation coupled to said public network, to coordinate the retrieval of video images from said surveillance cameras, to produce said retrieved video images as live images to the at least one client workstation, and to archive said retrieved video images in said image database for subsequent production to at least one

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client workstation coupled to said public network, wherein the client workstation cannot initialize communication with the surveillance cameras.

The present invention, as recited in Claim 1, includes a plurality of surveillance cameras that communicate with a centralized control site via a private network. The control site includes an off-site server that can communicate with the surveillance cameras. The off-site server also communicates with a client workstation via a public network. Serving as a communication layer, the off-site server facilitates a number of processes, including the initialization of communications between the client workstations and the surveillance cameras and the retrieval and transmission of live video images from the surveillance cameras. The control site also includes a video image database that facilitates archiving of the video images for subsequent retrieval by the client workstations.

Applicants agree that Vaios does not specifically teach a centralized control site including an image database and at least one server. Applicants further submit that Vaios clearly fails to teach a centralized control site that establishes a communication layer between client workstations and surveillance cameras. In contrast to the present invention, Vaios is limited to teaching direct communication between the end-user computing terminals and the surveillance security area over a single network connection. As specifically taught in Vaios, the direct communication link between the remote terminals and the surveillance security area is required as an advantage of the system. "Advantageously, the communications network offers a link to the Internet, allowing communication with the surveillance area from nearly any remote location at substantial convenience and reduced cost." (Col. 6, 1l. 54-57). Accordingly, applicants assert that not only does Vaios fail to teach or suggest a centralized control site as recited in Claim 1, but that a suggested modification of the Vaios system to incorporate any type of centralized control site would obviate the functionality of Vaios. Accordingly, Vaios is not properly

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Applicants further submit that Acosta et al. fails to teach a centralized control site with an image database and at least one server. Applicants note that the structure disclosed in Acosta et al. relied upon by the Office Action to teach an image database is a remote client computer (22). Clearly, the remote client computer disclosed in Acosta et al. does not provide for image archiving that allows the centralized control site server to provide images to a client workstation.

Under § 103, a prima facie case of obviousness is established only if the cited references, alone or in combination, teach or suggest each of the limitations of a recited claim. In re Bell, 991 F.2d 781 (Fed. Cir. 1993). As applied to Claim 1 of the present application, the cited references, Vaios and Acosta et al., fail to teach or suggest a centralized control site having an image database and a server operative to perform the recited functionality discussed above. Further, applicants note that the even if the cited references were to cumulatively teach each of the elements recited in Claim 1, which applicants deny, the primary reference, Vaios, cannot be properly combined with Acosta to include any centralized control site. For these reasons, applicants respectfully request a withdrawal of the § 103 rejection with regard to Claim 1.

2. Claims 2-15

Claims 2-15 depend from Claim 1 and are therefore patentable over Vaios and Acosta et al., alone or in combination, for at least the reasons recited above. Furthermore, the dependent claims include additional elements that further distinguish them over the art cited, some of which are discussed below. Accordingly, applicants respectfully request a withdrawal of the § 103 rejection with regard to Claims 2-15.

Claim 12 adds to the non-obviousness of applicants' invention that the off-site server is operative to "perform a course of action based upon parameters in a configuration file in

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response to the received event." The Office Action asserts that Acosta et al. teaches performing a course of action based upon parameters in a configuration file. As amended, however, Claim 12 requires that the course of action be in response to a received event. Applicants note that the cited portion of Acosta, Col. 13, ll. 22-67, refers to an camera initialization routine. Accordingly, applicants assert that the cited references, alone or in combination, fail to teach or suggest the additional limitation recited in Claim 12.

3. <u>Claim 16</u>

In manner similar to independent Claim 1, amended independent Claim 16 recites a centralized video surveillance and monitoring control system including an image database for storing video images and an off-site server. The off-site server coordinates the retrieval of video images from the surveillance cameras, initializes communications between the surveillance cameras and at least one off-site workstation coupled to a public network, and archives retrieved video images for subsequent production to at least one client workstation. As detailed above, Vaios and Acosta et al, alone or in combination, fails to teach a centralized video surveillance and monitoring control system including an image database and a server performing the recited functions. Further, applicants again note that the system disclosed in Vaios would be incompatible with the recited centralized video surveillance and monitoring control system and is not properly combinable with any reference to teach the recited invention. Accordingly, for these reasons, applicants respectfully request a withdrawal of the § 103 rejection with regard to Claim 16.

4. <u>Claims 17-26</u>

In manner similar to independent Claims 1 and 16, independent Claim 17 recites a video surveillance and monitoring method that includes "receiving video images from a surveillance camera," "producing said received video image data as live images to at least one client

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workstation," and "archiving said received video image data in an image database for subsequent production to at least one client workstation." As stated above, Vaios clearly fails to teach any centralized control site that performs any of the recited method of Claim 17. Further, applicants assert that Vaios would be incompatible with a centralized control site that would defeat the intended function and the stated advantages of the end-user terminals of the system taught in Vaios. Applicants further assert that Acosta et al. fails to teach an image database for storing retrieved images for subsequent transmission to a client workstation. For these reasons, applicants respectfully request a withdrawal of the § 103 rejection with regard to Claim 17.

Claims 18-26 depend from Claim 17 and are therefore patentable over Vaios and Acosta et al., alone or in combination, for at least the reasons recited above. Furthermore, the dependent claims include additional elements that further distinguish them over the art cited, some of which are discussed below. Accordingly, applicants respectfully request a withdrawal of the § 103 rejection with regard to Claims 18-26.

Amended Claim 23 adds to the non-obviousness of applicants' invention "receiving event data from a client site" and "performing a course of action based upon parameters in a configuration file in response to the event data." As stated above with regard to Claim 12, Claim 23 recites that the course of action be in response to a received event. In contrast, the cited references are silent upon post-event action initiation. Accordingly, applicants assert that the cited references, alone or in combination, fail to teach or suggest the additional limitation recited in Claim 23.

5. Claims 27-30

In manner similar to independent Claims 1, 16, and 17, independent Claim 27 recites a video surveillance and monitoring method as follows:

In an environment including at least one control server coupled to a private network that enables communication with surveillance cameras at a

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plurality of geographically distinct client sites, a method in a client workstation for retrieving and viewing video images, captured by said surveillance cameras. that are stored in an image database by the at least one server, comprising:

- receiving computer program logic from a server that enables the client workstation to display a graphical user interface that includes a plurality of client-site elements representative of a corresponding plurality of geographically distinct client sites, wherein each of said plurality of client-site elements are associated with one or more camera elements representative of one or more cameras located at a client site represented by said client-site element, wherein said server has access to an image database that stores video image data capture by cameras at a plurality of geographically distinct client sites;
- receiving a command from a user to select from a first camera element representative of a first camera at a first client site;
- sending a request to a server for retrieval of video image data, recorded by said first camera, that is archived in an image database; and
- displaying said requested video image data in an image viewing window of said graphical user interface.

As discussed above, the cited references, alone or in combination, clearly fail to teach any centralized control site that performs functions related to the initialization of communications between client workstations and surveillance computers. Further, applicants assert that Vaios would be incompatible with a centralized control site that would defeat the intended function and expressed advantages of the end-user terminals of the system taught in Vaios. Accordingly, applicants assert that because the cited art fails to teach a centralized control site, the cited references, alone or in combination, would further fail to teach or suggest a method reciting the interaction between a client workstation and a server at the centralized control site as recited in Claim 27. Accordingly, for these reasons, applicants respectfully request a withdrawal of the § 103 rejection with regard to Claim 27.

Claims 28-30 depend from Claim 27 and are therefore patentable over Vaios and Acosta et al., alone or in combination, for at least the reasons recited above. Furthermore, the dependent claims include additional elements that further distinguish them over the art cited, some of which

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are discussed below. Accordingly, applicants respectfully request a withdrawal of the § 103 rejection with regard to Claims 28-30.

III. Conclusion

In light of the foregoing amendments and remarks, applicants submit that all the claims of the present application, Claims 1-50, are in condition for allowance. Applicants respectfully request entry of the amendments, reconsideration, and allowance of all claims. The Examiner is invited to telephone the undersigned attorney if there are any remaining issues.

Respectfully submitted,

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1 hereby certify that this correspondence is being transmitted via facsimile to the U.S. Patent and Trademark Office, Group Art Unit 2613, Examiner S. S. An., at facsimile number 703.872.9314, on povember 22, 2002.

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VERSION WITH MARKINGS TO SHOW CHANGES MADE NOVEMBER 22, 2002 In the Claims

Claims 1, 4, 13, 16, 17, and 34 have been amended as follows:

(Amended) A video surveillance and monitoring system, comprising:

a private network that enables communication with surveillance cameras [located on-site at a plurality of geographically distinct client sites] corresponding to geographic sites, wherein at least two surveillance cameras correspond to geographically distinct sites; and

a centralized off-site [storage] control site, including an image database and at least one server, said at least one server being coupled to said private network and to a public network, said at least one server being operative to initialize communications between the surveillance cameras and at least one off-site client workstation coupled to said public network, to coordinate the retrieval of video images from said surveillance cameras, to produce said retrieved video images as live images to the at least one client workstation [coupled to said public network], and to archive said retrieved video images in said image database for subsequent production to at least one client workstation coupled to said public network, wherein the client workstation cannot initialize communication with the surveillance cameras.

- 4. (Amended) The system of Claim 3, wherein said one or more surveillance cameras produce composite NTSC video signals, and wherein the camera server is operable to capture the NTSC video signals and convert the captured NTSC video signals.
- 13. (Amended) The system of Claim [12]31 wherein upon the receipt of data identifying an occurrence of an event, said off-site server is operative to send a text page to one or more recipients alerting said one or more recipients of the occurrence of said event.
 - 16. (Amended) A <u>centralized</u> video surveillance and monitoring system, comprising: an image database for storing video images; and

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at least one server, said at least one server being coupled to a private network that enables communication with surveillance cameras at a plurality of geographically distinct client sites and to a public network, said at least one server being operative to initialize communications between the surveillance cameras and at least one off-site client workstation coupled to said public network, to coordinate the retrieval of video images from said surveillance cameras, to produce said retrieved video images as live images to the at least one client workstation [coupled to said public network], and to archive said retrieved video images in said image database for subsequent production to at least one client workstation coupled to said public network, wherein the client workstation cannot initialize communication with the surveillance cameras.

- 17. (Amended) In an environment including at least one <u>control</u> server coupled to a private network that enables communication with surveillance cameras at a plurality of geographically distinct client sites and to a public network, wherein the public network cannot initialize communication with the surveillance cameras, a <u>centralized</u> video surveillance and monitoring method, comprising [the steps of]:
 - (a) receiving video image data from a surveillance camera;
- (d) producing said received video image data as live images to at least on client workstation via the public network; and
- (e) archiving said received video image data in an image database for subsequent production to at least on client workstation.
- 27. (Amended) In an environment including at least one <u>control</u> server coupled to a private network that enables communication with surveillance cameras at a plurality of geographically distinct client sites, a method in a client workstation for retrieving and viewing video images, captured by said surveillance cameras, that are stored in an image database by the at least one server, comprising [the steps of]:

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- (h) receiving computer program logic from a server that enables the client workstation to display a graphical user interface that includes a plurality of client-site elements representative of a corresponding plurality of geographically distinct client sites, wherein each of said plurality of client-site elements are associated with one or more camera elements representative of one or more cameras located at a client site represented by said client-site element, wherein said server has access to an image database that stores video image data capture by cameras at a plurality of geographically distinct client sites;
- (i) receiving a command from a user to select from a first camera element representative of a first camera at a first client site;
- (j) sending a request to a server for retrieval of video image data, recorded by said first camera, that is archived in an image database; and
- (k) displaying said requested video image data in an image viewing window of said graphical user interface.

Claims 31-50 have been added.

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